

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC. AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL THEIR OPPOSITION TO  
WAYMO'S MOTION TO COMPEL  
FURTHER DEPOSITIONS AND  
INTERROGATORIES**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and  
7 Ottomotto, LLC’s Administrative Motion to File Under Seal Their Opposition to Waymo’s Motion to  
8 Compel Further Depositions and Interrogatories (the “Administrative Motion”). The Administrative  
9 Motion seeks an order sealing highlighted portions of Uber’s Opposition to Waymo’s Motion to  
10 Compel (“Uber’s Opposition”) and Exhibits 1-3 and 6-8 thereto, as well as the entirety of Exhibits 4  
11 and 9 thereto.

12 3. The green highlighted portions of Uber’s Opposition and Exhibits 1-2 contain or refer  
13 to trade secret information, which Waymo seeks to seal.

14 4. Uber’s Opposition (green highlighted portions) and Exhibits 1-2 (green highlighted  
15 portions) contain, reference, and/or describe Waymo’s asserted trade secrets or information that, from  
16 context, tends to disclose Waymo’s asserted secrets. The information Waymo seeks to seal includes  
17 the confidential design and functionality of Waymo’s proprietary autonomous vehicle system,  
18 including its LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets  
19 are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s  
20 business (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors  
21 access to descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such  
22 information were made public, I understand that Waymo’s competitive standing would be  
23 significantly harmed.

24 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Opposition  
25 and Exhibits 1-2 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on October 2, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7  
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.

11  
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven